

March 30, 2020

Patricia O'Connor, Supervisor
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Re: Snow King Draft EIS-Submitted electronically

I am writing to provide public input on the Snow King Draft EIS.

Before commenting I want to thank you for extending the time and opportunity for public comment on this important matter which has and will have such an enduring impact on the landscape and character of Jackson.

I am deeply concerned that this EIS is fundamentally flawed. It fails to present and consider a range of reasonable alternatives as clearly required by the National Environmental Policy Act. All of the "alternatives" other than the no action alternative are basically the same. None consider keeping road improvement up the face of Snow King within the current permit boundaries. None consider limiting additional commercial expansion on top of Snow King to only recreational improvements related solely to snow sports.

The Ski Area Outdoor Recreation Enhancement Act (SAOREA) which governs the review and action on this proposal requires that each activity/facility shall harmonize with the natural environment of the affected National Forest land and be located within the developed portions of the ski area. The proposed new road meets neither of these legal requirements.

There is no fact based visual or resource analysis of the impact of the radically expanded road layout on the natural environment of Snow King outside of the current permit boundaries. Nor is there any discussion or consideration of the alternative road configurations that would stay within the boundaries of the current Snow King permit area. The Rod Newcomb proposal of the "Bill Briggs" road layout clearly demonstrates the viability of a modified access road design located entirely within the current permit area. No consideration is given to upgrading the current road in its existing configuration.

Creating a major new commercial hub for the Snow King resort on top of Snow King mountain is not and should not be the business of the Forest Service. SAOREA provides that the Forest Service may authorize a ski area to provide natural resource-based recreational activities and associated facilities on National Forest System land. A dedicated wedding venue and a meeting venue do not meet these clear limitations and an alternative should have been presented which does not include them.

The Bridge-Teton National Forest lands on Snow King mountain are an important part of the landscape of Jackson Hole and the historic and substantial public use of those lands mandate that any major private alterations be given careful and fact based consideration as required by law and Forest Service regulations. The current draft EIS fails to comply with the law and Forest Service regulations and should be pulled back and revised to provide a full analysis of real alternatives.

Thank you for the opportunity to comment.

Hank Phibbs